

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-v-

**ALL FUNDS AND OTHER PROPERTY
ON DEPOSIT IN THE NINETEEN BANK
ACCOUNTS LISTED ON ATTACHMENT A,
AND ALL PROPERTY TRACEABLE THERETO,**

and

**ALL RIGHT, TITLE AND INTEREST
IN THE SEVEN PIECES OF REAL PROPERTY
LISTED IN ATTACHMENT B, WITH ALL
IMPROVEMENTS, ATTACHMENTS AND
EASEMENTS THEREON,**

ANSWER OF CLAIMANT SUNDARYAMMA CHENNAREDDY

Claimant Soundaryamma Chennareddy, by and through undersigned counsel,
answers the allegations in Plaintiff's Complaint as follows:

Nature of the Action

1. Claimant admits that this is an action seeking forfeiture. The other allegations are denied.
2. Claimant admits that the Defendant Bank Accounts to which she has an interest have been frozen. Claimant lacks sufficient knowledge or information to enable her to answer the allegations regarding the other Accounts or Properties contained in paragraph 2 and therefore denies those allegations.

Jurisdiction and Venue

3. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 3 and therefore denies each and every allegation.

4. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 4 and therefore denies each and every allegation.

Probable Cause for Forfeiture

5. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 5 and therefore denies each and every allegation.

6. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 6 and therefore denies each and every allegation.

7. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 7 and therefore denies each and every allegation.

8. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 8 and therefore denies each and every allegation.

9. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 9 and therefore denies each and every allegation.

10. Denied.

11. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 11 and therefore denies each and every allegation.

12. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 12 and therefore denies each and every allegation.

13. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 13 and therefore denies each and every allegation.

14. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 14 and therefore denies each and every allegation.

15. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 15 and therefore denies each and every allegation.

THE DEFENDANT BANK ACCOUNTS

I. Accounts at Bank of America

ACCOUNT NUMBER 472900440, HELD IN THE NAME OF TECHNODYNE (the “BoA 4400 Account”)

16. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 16 and therefore denies each and every allegation.

17. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 17 and therefore denies each and every allegation

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 17(a) and therefore denies each and every allegation.

b. Claimant admits the allegations of paragraph 17(b), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

c. Claimant admits the allegations of paragraph 17(c), but denies that any transfers were used to launder proceeds of the alleged fraud scheme set forth in the indictment or the allegation that the transactions facilitated any such conduct.

d. Claimant admits the allegations of paragraph 17(d), but denies any suggestion that any transfers were used for an illegal or illicit purpose

e. Claimant admits the allegations of paragraph 17(e), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

f. Claimant lacks sufficient knowledge or information to enable her to answer the allegations in paragraph 17(f) and therefore denies each and every allegation.

g. Claimant lacks sufficient knowledge or information to enable her to answer the allegations in paragraph 17(g) and therefore denies each and every allegation.

ACCOUNT NUMBER 9505241812, HELD IN THE NAME OF TECHNODYNE LLC
(the "BoA 1812 Account")

18. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 18 and therefore denies each and every allegation.

19. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 19 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 19(a) and therefore denies the allegation.

b. Claimant admits the allegations of paragraph 19(b), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

c. Claimant admits the allegations of paragraph 19(c), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

d. Claimant admits the allegations of paragraph 19(d), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

e. Claimant lacks sufficient knowledge or information to enable her to answer the allegations in paragraph 19(e) and therefore denies each and every allegation.

ACCOUNT NUMBER 9505241820, HELD IN THE NAME OF TECHNODYNE LLC
(the "BoA 1820 Account")

20. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 20 and therefore denies each and every allegation.

21. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 21 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 21(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 21(b) and therefore denies each and every allegation.

c. Claimant admits the allegations of paragraph 21(c), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

d. Claimant admits the allegations of paragraph 21(d), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

e. Claimant admits the allegations of paragraph 21(e), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

f. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 21(f) and therefore denies each and every allegation.

g. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 21(g) and therefore denies each and every allegation.

ACCOUNT NUMBER 9476948965, HELD IN THE NAME OF TECHNODYNE LLC
(the "BoA 8965 Account")

22. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 22 and therefore denies each and every allegation.

23. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 23 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 23(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 23(b) and therefore denies each and every allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 23(b) and therefore denies each and every allegation.

ACCOUNT NUMBER 4032028150, HELD IN THE NAME OF KAVERI
INTERNATIONAL INC D/B/A MCCREADE INFORMATION TECHNOLOGY (the "BoA
8150 Account")

24. Admitted.

25. Denied.

a. Claimant admits the allegations of paragraph 25(a), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

1. Claimant admits the allegations of paragraph 25(a)(1), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

2. Claimant admits the allegations of paragraph 25(a)(2), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

3. Claimant admits the allegations of paragraph 25(a)(3), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

4. Claimant admits the allegations of paragraph 25(a)(4), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

5. Claimant admits the allegations of paragraph 25(a)(5), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

6. Claimant admits the allegations of paragraph 25(a)(6), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

b. Claimant admits the allegations of paragraph 25(b), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

c. Claimant admits the allegations of paragraph 25(c), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

d. Claimant admits the allegations of paragraph 25(d), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

e. Claimant admits the allegations of paragraph 25(e), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

f. Claimant admits the allegations of paragraph 25(f), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

g. Claimant admits the allegations of paragraph 25(g), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

h. Claimant admits the allegations of paragraph 25(h), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

ACCOUNT NUMBER 4032023159, HELD IN THE NAME OF PADMA S. ALLEN
OR VENKATAPPA R. ALLEN (the "BoA 3159 Account")

26. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 26 and therefore denies each and every allegation.

27. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 27 and therefore denies each and every allegation

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 27(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 27(b) and therefore denies the allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 27(c) and therefore denies each and every allegation.

d. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 27(d) and therefore denies each and every allegation.

e. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 27(e) and therefore denies each and every allegation.

f. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 27(f) and therefore denies each and every allegation.

II. Accounts at Capital One

ACCOUNT NUMBER 5314001008, HELD IN THE NAME OF TECHNODYNE LLC (the "Capital One 1008 Account")

28. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 28 and therefore denies each and every allegation.

29. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 29 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 29(a) and therefore denies each and every allegation..

b. Claimant admits the allegations of paragraph 29(b), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

c. Claimant admits the allegations of paragraph 29(c), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

d. Claimant admits the allegations of paragraph 29(d), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

e. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 29(e) and therefore denies each and every allegation.

ACCOUNT NUMBER 4244009710, HELD IN THE NAME OF TECHNODYNE LLC
(the "Capital One 9710 Account")

30. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 30 and therefore denies each and every allegation.

31. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 31 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 31(a) and therefore denies each and every allegation.

b. Claimant admits the allegations of paragraph 31(b), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

c. Claimant admits the allegations of paragraph 31(c), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

d. Claimant admits the allegations of paragraph 31(c), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

e. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 31(e) and therefore denies each and every allegation.

f. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 31(f) and therefore denies each and every allegation.

g. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 31(g) and therefore denies each and every allegation.

ACCOUNT NUMBER 4244009736, HELD IN THE NAME OF TECHNODYNE, LLC
(the "Capital One 9736 Account")

32. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 32 and therefore denies each and every allegation.

33. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 33 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 33(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 33(b) and therefore denies each and every allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 33(c) and therefore denies each and every allegation.

d. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 33(d) and therefore denies each and every allegation.

e. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 33(e) and therefore denies each and every allegation.

f. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 33(f) and therefore denies each and every allegation.

III. Accounts at Fidelity

ACCOUNT NUMBER X24-994634, HELD IN THE NAME OF PADMA S. ALLEN AND REDDY V. ALLEN (the "Fidelity 4634 Account")

34. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 34 and therefore denies each and every allegation.

35. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 35 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 35(a) and therefore denies each and every allegation.

IV. Accounts at HSBC

ACCOUNT NUMBER 048895270, HELD IN THE NAME OF TECHNODYNE LLC (the "HSBC 5270 Account")

36. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 36 and therefore denies each and every allegation.

37. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 37 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 37(a) and therefore denies each and every allegation.

ACCOUNT NUMBER 04884952, HELD IN THE NAME OF TECHNODYNE
UNIVERSITY LLC (the "HSBC 4952 Account")

38. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 38 and therefore denies each and every allegation.

39. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 39 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 39(a) and therefore denies each and every allegation.

ACCOUNT NUMBER 044895300, HELD IN THE NAME OF REDDY V. ALLEN and
PADMA ALLEN (the "HSBC 5300 Account"); and
ACCOUNT NUMBER 048499439, HELD IN THE NAME OF REDDY ALLEN IN
TRUST FOR RYAN ALLEN (the "HSBC 9439 Account")

40. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 40 and therefore denies each and every allegation.

41. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 41 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 41(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 41(b) and therefore denies each and every allegation.

V. Accounts at PNC Bank

ACCOUNT NUMBER 8019108309, HELD IN THE NAME OF PADMA SACHI ALLEN (the "PNC 8309 Account"); and
ACCOUNT NUMBER 8019112957, HELD IN THE NAME OF PADMA SACHI ALLEN (the "PNC 2957 Account")

42. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 42 and therefore denies each and every allegation.

43. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 43 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 43(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 43(b) and therefore denies each and every allegation.

ACCOUNT NUMBER 802099866, HELD IN THE NAME OF SOUNDARYAMMA CHENNA REDDY (the "PNC 9866 Account")

44. Admitted.

45. Claimant admits the allegations of paragraph 45, but denies any suggestion that any transfers were used for an illegal or illicit purpose.

a. Claimant admits the allegations of paragraph 45(a), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

c. Claimant admits the allegations of paragraph 45(c), but denies any suggestion that any transfers were used for an illegal or illicit purpose.

V. Accounts at State Bank of India

ACCOUNT NUMBER 77606828420001, HELD IN THE NAME OF TECHNODYNE LLC (the "SBI 0001 Account")

46. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 46 and therefore denies each and every allegation.

47. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 47 and therefore denies each and every allegation.

(a) Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 47(a) and therefore denies each and every allegation.

VI. Accounts at TD Bank

ACCOUNT NUMBER 4733278877, HELD IN THE NAME OF PADMA ALLEN (the "TD Bank 8877 Account")

48. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 48 and therefore denies each and every allegation.

49. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 49 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 49(a) and therefore denies each and every allegation.

The Defendant Properties

6 Little Place, Wayne, New Jersey 07470 (the "6 Little Place Property")

50. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 50 and therefore denies each and every allegation.

51. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 51 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 51(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 51(b) and therefore denies each and every allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 51(c) and therefore denies each and every allegation.

d. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 51(d) and therefore denies each and every allegation.

e. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 51(e) and therefore denies each and every allegation.

109 EAST SHEARWATER COURT, #12 JERSEY CITY, NEW JERSEY 07302 (the
“109 East Shearwater Court Property”)

52. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 52 and therefore denies each and every allegation.

53. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 53 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 53(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 53(b) and therefore denies each and every allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 53(c) and therefore denies each and every allegation.

d. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 53(d) and therefore denies each and every allegation.

8018 BRITTANY DRIVE, WAYNE TOWNSHIP, NEW JERSEY 07470 (the “8018 Brittany Drive Property”)

54. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 54 and therefore denies each and every allegation.

55. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 55 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 55(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 55(b) and therefore denies each and every allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 55(c) and therefore denies each and every allegation.

595 VALLEY ROAD, WAYNE, NEW JERSEY (the “595 Valley Road Property”)

56. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 56 and therefore denies each and every allegation.

57. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 57 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 57(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 57(b) and therefore denies each and every allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 57(c) and therefore denies each and every allegation.

d. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 57(d) and therefore denies each and every allegation.

e. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 57(e) and therefore denies each and every allegation.

30 FREEDOM WAY, #301 JERSEY CITY, NEW JERSEY 07305 (the “30 Freedom Way Property”)

58. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 58 and therefore denies each and every allegation.

59. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 59 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 59(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 59(b) and therefore denies each and every allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 59(c) and therefore denies each and every allegation.

d. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 59(d) and therefore denies each and every allegation.

1480 RATZER ROAD, WAYNE, NEW JERSEY 07470 (the “1480 Ratzer Road Property”)

60. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 60 and therefore denies each and every allegation.

61. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 61 and therefore denies each and every allegation.

a. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 61(a) and therefore denies each and every allegation.

b. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 61(b) and therefore denies each and every allegation.

c. Claimant lacks sufficient knowledge or information to enable her to answer the allegations of paragraph 61(c) and therefore denies each and every allegation.

6 ARIEL COURT, PORT WASHINGTON, NEW YORK 11050 (the “6 Ariel Court Property”)

62. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 62 and therefore denies each and every allegation.

63. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 63 and therefore denies each and every allegation.

64. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 64 and therefore denies each and every allegation.

Claims for Forfeiture

18 U.S.C. § 981(a)(1)(C)

65. Claimant repeats, as though fully set forth, each and every answer stated in paragraphs 1 through 64 above.

66. Paragraph 66 is a statement of law that requires no answer.

67. Paragraph 67 is a statement of law that requires no answer.

68. Paragraph 68 is a statement of law that requires no answer.

69. Paragraph 69 is a statement of law that requires no answer.

70. Denied as to the Defendant Accounts in which Claimant has an interest. Claimant lacks sufficient knowledge or information to enable her to answer the allegations regarding the Accounts and Properties in which she has no interest, and therefore those allegations are denied.

18 U.S.C. § (a)(1)(A)

71. Claimant repeats, as though fully set forth, each and every answer stated in paragraphs 1 through 70 above.

72. Paragraph 72 is a statement of law that requires no answer.

73. Paragraph 73 is a statement of law that requires no answer.

74. Paragraph 74 is a statement of law that requires no answer.

75. Paragraph 75 is a statement of law that requires no answer.

76. Paragraph 76 is a statement of law that requires no answer.

77. Paragraph 77 is a statement of law that requires no answer.

78. Paragraph 78 is a statement of law that requires no answer.

79. Paragraph 79 is a statement of law that requires no answer.

80. Paragraph 80 is a statement of law that requires no answer.

81. Denied as to the Defendant Accounts in which Claimant has an interest. Claimant lacks sufficient knowledge or information to enable her to answer the allegations regarding the Accounts and Properties in which she has no interest, and therefore those allegations are denied.

82. Claimant lacks sufficient knowledge or information to enable her to answer the allegations contained in paragraph 82 and therefore denies the allegation.

First Affirmative Defenses- Failure to State a Claim

83. Claimant alleges that the complaint in its entirety, and each and every separately states cause of action or claim contained therein, fails to state facts sufficient to constitute a claim upon which relief may be granted.

Second Affirmative Defense- No Probable Cause

84. Claimant alleges that the Plaintiff, United States of America, lacks probable cause to institute this forfeiture action.

Third Affirmative Defense- Statute of Limitations

85. Claimant alleges that the Complaint in its entirety and each and every claim for relief contained therein is barred by the statute of limitations.

Fourth Affirmative Defense-Innocent Interest – Due Process

86. Claimant asserts that her interests in BoA 8150 Account and PNC 9866 Account are innocent, in that Claimant had at no time any knowledge of any of the allegedly fraudulent acts or omissions as alleged in the Complaint for Forfeiture. Accordingly, her interests in these accounts are not subject to forfeiture under the provisions of Title 18, United States Code, § 981, and forfeiture is prohibited by the Due Process Clause of the Fifth Amendment to the United States Constitution.

WHEREFORE, Claimant prays for judgment as follows:

- A. Plaintiff's action be dismissed and plaintiff take nothing by way of its Complaint;
- B. Claimant's property be released to her free of any encumbrance of the United States or its agents; and
- C. For other such relief as the Court deems just and proper.

Respectfully submitted,

/s/

Barry Coburn, admitted *pro hac vice*
Lloyd Liu, admitted *pro hac vice*
Coburn & Greenbaum, PLLC
99 Hudson Street
5th Floor
New York, New York 10013
barry@coburngreenbaum.com
Telephone: (202) 567-5006
Facsimile: (866) 561-9712

Counsel for Claimant Soundaryamma Chennareddy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of June, 2012, a copy of the forgoing Notice of Claim was served via ECF upon the following:

Andrew D. Goldstein
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
Counsel for the United States

Kiera McFadden-Roan, Esquire
Parker McCay, P.A.
9000 Midlantic Drive, Suite 300
Mount Laurel, NJ 08054
Counsel for US Bank, NA and The Bank of New York Mellon

Krishnan Chittur, Esq.
Chittur & Associates, PC
286 Madison Avenue, Suite 1100
New York, New York 10017
Counsel for Purnachandra Aramalla and Ushachandra Aramalla

Dated: June 22, 2012

/s/

Barry Coburn